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UNITED STATES OF AMERICA

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

JUL 06 2000
at 10 o'clock and 55 min. A.M.
WALTER A. Y. H. CHINN, CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 00-00139 HG
)	
Plaintiff,)	SUPERSEDING INDICTMENT
)	
vs.)	[Title 21 U.S.C. Sections
)	841(a)(1), (b)(1)(A) and
DAMASO ZAMBRANO,	(01))	846]
ROSA HERNANDEZ, and	(02))	
RAMON ALFREDO PEREZ,	(03))	
)	
Defendants.)	
)	

SUPERSEDING INDICTMENT

COUNT 1:

The Grand Jury charges that:

From a time unknown to the Grand Jury, but at least from a date in or about December 1999, and up through and including April 1, 2000, in the District of Hawaii, and elsewhere,

DAMASO ZAMBRANO,
ROSA HERNANDEZ,
and
RAMON ALFREDO PEREZ

defendants herein, did willfully and unlawfully conspire together with each other, and others known and unknown to the grand jury, to knowingly and intentionally possess with intent to distribute, in excess of fifty (50) grams of crystal methamphetamine, a Schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1).

It was the object of the aforesaid conspiracy to possess for distribution crystal methamphetamine in Hawaii.

OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, the defendants performed overt acts in the District of Hawaii and elsewhere which include, but are not limited to, the following:

1. On March 25, 2000, ZAMBRANO informed HERNANDEZ that she would be receiving a parcel containing crystal methamphetamine and heroin in the mail. HERNANDEZ informed PEREZ of the impending delivery of the parcel.

2. On or about March 29, 2000, ZAMBRANO went to the home of PEREZ and HERNANDEZ and gave to PEREZ one-fourth ounce of crystal methamphetamine as prepayment for accepting the expected parcel. ZAMBRANO represented to PEREZ that the balance of three-fourths ounce of crystal methamphetamine would be paid once the parcel arrived.

3. On or about April 1, 2000, PEREZ accepted delivery of the subject parcel and alerted ZAMBRANO and HERNANDEZ of its arrival.

4. On April 1, 2000, ZAMBRANO and PEREZ opened the subject parcel after its delivery.

5. In December of 1999, HERNANDEZ and PEREZ received two parcels containing illegal drugs via United Parcel Services.

6. In January of 2000, HERNANDEZ and PEREZ received three parcels containing illegal drugs via United Parcel Services.

7. In February of 2000, HERNANDEZ and PEREZ received two parcels containing illegal drugs via United Parcel Services.

8. In February of 2000, HERNANDEZ and PEREZ received one parcel containing illegal drugs via Express Mail.

9. In March of 2000, HERNANDEZ and PEREZ received two parcels containing illegal drugs via United Parcel Services.

10. In March of 2000, HERNANDEZ and PEREZ received two parcels containing illegal drugs via Express mail.

All in violation of Title 21, United States Code, Section 846.

COUNT 2:

The Grand Jury further charges that:

On or about April 1, 2000, **DAMASO ZAMBRANO, ROSA HERNANDEZ** and **RAMON ALFREDO PEREZ**, within the District of Hawaii, did knowingly and intentionally attempt to possess with intent to distribute, in excess of fifty (50) grams of crystal

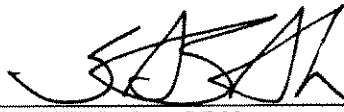
methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and 846.

DATED: July 6, 2000 at Honolulu, Hawaii.

A TRUE BILL

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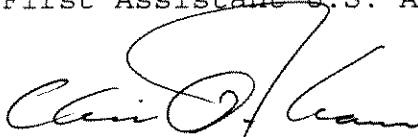
FOREPERSON, GRAND JURY



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United States v. Damaso Zambrano, et al.
"Superseding Indictment"
Cr. No. 00-00139 HG